

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

<b>In re:</b>	§	
	§	<b>Case No. 14-60041</b>
	§	
<b>BUCCANEER RESOURCES, L.L.C., et al.</b>	§	<b>Chapter 11</b>
	§	
<b>Debtors.</b>	§	<b>(Jointly Administered)</b>

**MOTION OF CURRENT DIRECTORS  
FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM**

IF YOU WANT A HEARING, YOU MUST REQUEST ONE IN WRITING, AND YOU MUST RESPOND SPECIFICALLY TO EACH PARAGRAPH OF THIS PLEADING. YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY DAYS FROM THE DATE YOU WERE SERVED AND GIVE A COPY TO THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF.

IF A PARTY REQUESTS EMERGENCY CONSIDERATION, THE COURT MAY ACT EXPEDITIOUSLY ON THE MATTER. IF THE COURT ALLOWS A SHORTER RESPONSE TIME THAN TWENTY DAYS, YOU MUST RESPOND WITHIN THAT TIME. IF THE COURT SETS AN EMERGENCY HEARING BEFORE THE RESPONSE TIME WILL EXPIRE, ONLY ATTENDANCE AT THE HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS. IF AN EMERGENCY HEARING IS NOT SET, YOU MUST RESPOND BEFORE THE RESPONSE TIME EXPIRES.

TO THE HONORABLE DAVID R. JONES:

Gavin Wilson (“Wilson”), Patrick O’Connor, and Alan Stein (collectively, the “Directors”) file this Motion for Allowance of Administrative Expense Claim and respectfully state as follows:

1. The Court has signed an Order establishing an administrative claims bar date for claims arising on or before October 31, 2014. Docket 450 (the “Administrative Bar Date Order”).

2. The Directors have a pending administrative expense claim payable by the Creditors' Trust or from settlement proceeds otherwise payable under a prior Court approved settlement, via their Joint Directors' Application for Reimbursement of Fees and Expenses for fees and costs associated with the 2004 document production and examination process instigated by the Committee, which is filed at docket number 454 (the "Joint Application"). To whatever extent the amounts in the Joint Application are not satisfied from the Creditors' Trust or proceeds allocable thereto, the Directors request payment from the estate as an administrative expense.

3. Separately, Wilson has a pending administrative expense claim arising from the Debtors' obligations to the Directors unrelated to the 2004 document production and examination process filed at docket numbers 516 and 517, for services from Haynes and Boone, LLP. In addition, the Directors also have a pending administrative expense claim arising from the Debtors' obligations to the Directors unrelated to the 2004 document production and examination process for services from Baker Botts L.L.P. The Directors also have other administrative expenses associated with time and expenses relating to the Debtors' obligations to the Directors owing for additional costs incurred in connection with the matters in this case. In particular, there has been filed the Second Notice and statement to various notice parties by Haynes and Boone, LLP for payment of \$12,128.25 for fees and expenses (\$9,884.00 in fees and \$3,244.25 in expenses) incurred from October 14, 2014 through October 31, 2014. See Docket 524.

4. The Directors request that all of their administrative expense claims incurred in connection with their roles as nonexecutive directors be given administrative expense status in the case. This would include all of their rights under any indemnity agreements or as a result of

compensation or benefit plans to which they have any right to seek in recovery or reimbursement. The Directors make this request to comply with the Administrative Bar Date Order, though they note that, as to the Joint Directors' Application for Reimbursement of Fees and Expenses for fees and costs associated with the 2004 examination process instigated by the Committee, Docket 454, this is first payable, subject to the Court's further Order, from the Creditors' Trust to be established under a proposed Plan.

5. Notice of this Motion has been served by electronic mail via the Court's ECF system to all parties authorized to receive electronic notice in this case.

WHEREFORE, the Directors pray that they be allowed an administrative expense claim for these items along with any other of the Debtors' obligations to the Directors, including defense and indemnity costs and expenses, arising during the relevant time period and for such other relief as is just and equitable.

Dated: November 14, 2014

Respectfully submitted,

**HAYNES AND BOONE, LLP**

/s/ Patrick L. Hughes

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**BAKER BOTTS L.L.P.**

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**ATTORNEYS FOR PATRICK O'CONNOR,  
GAVIN WILSON, AND ALAN STEIN**